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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

JOHN ARMSTRONG, et al.,

Plaintiffs,

v.

GAVIN NEWSOM, et al.,

Defendants.

C 94-2307 CW

DECLARATION B. HANCOCK

I, B. Hancock, hereby declare and state:

1. I am employed by the California Department of Corrections and Rehabilitation (CDCR) as a Correctional Counselor II at Kern Valley State Prison (KVSP). I have worked for CDCR for over sixteen years. In my career with CDCR, I have served as a Correctional Officer, a Correctional Counselor I, and a Correctional Counselor II. I also worked as a member of KVSP's Investigative Services Unit for over three years. I have served as the Litigation Coordinator at KVSP since August 2014.

2. My duties require me to be familiar with CDCR policies and procedures for keeping records concerning inmates. I am familiar with CDCR's electronic-record systems for inmates, including the Strategic Offender Management System (SOMS) and the Electronic Records Management System (ERMS). SOMS contains various details about inmates' sentences and release dates, and other information. ERMS contains scanned copies of paper documents related to an inmate's prison records. These records are made at or near the time of the events that they record and are made by, or transmitted by, persons with knowledge of the events and the obligation to record accurate information. These records are kept within the usual course and scope of CDCR business practices. My position provides me with access to ERMS/SOMS. I accessed the ERMS/SOMS file for [REDACTED] According to ERMS/SOMS, he was housed at KVSP from approximately August 19, 2019 to October 15, 2020.

3. As part of KVSP's electronic record keeping practices, KVSP maintains a record of all in-coming and out-going legal mail for each inmate housed at the institution. These records are made at or near the time of the events that they record and are made by, or transmitted by, persons with knowledge of the events and the obligation to record accurate information. These records are kept within the usual course and scope of CDCR business practices and I have access to these records as the litigation coordinator. I accessed the legal-mail records for the foregoing inmate during his incarceration at KVSP. Attached as Exhibit A is a true and correct copy of the inmates in-coming and out-going legal mail from approximately September 2019 to October 2020.

I swear under penalty of perjury that the statements in this declaration are true and correct to the best of my knowledge. Signed at Delano, California, on November 16, 2020.



Brian Hancock, Litigation Coordinator
Kern Valley State Prison

CF1997CS0005

EXHIBIT A

